

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES
INBOUND COMPETITIVE MULTI-SERVICE AGREEMENTS WITH
FOREIGN POSTAL OPERATORS
INTERCONNECT REMUNERATION AGREEMENT – UNITED STATES
POSTAL SERVICE AND SPECIFIED POSTAL OPERATORS
(MC2010-34)
NEGOTIATED SERVICE AGREEMENT

Docket No.
CP2020-141

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 2**
(December 29, 2020)

The United States Postal Service (Postal Service) hereby responds to
Chairman's Information Request No. 2, issued on December 23, 2020. The questions
are stated verbatim and are followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

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December 29, 2020

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1. Please refer to the Notice, Attachment 3, the June 29 Notice,¹ and Excel file "NONPUBLIC USPS-CP2020-141-IB_SP_WP.xlsx" (Standard Packets file), tab "07_Summary," cell C24.
 - a. As the country in question suspended the IRA-USPS Agreement effective January 1, 2021, please explain why the Postal Service included revenue from this country's tracked standard packet volume in cell C24.
 - b. Please see attachment filed under seal.
 - c. Please explain why the Postal Service did not include the cost for the tracking service provided to standard packets from this country.
 - d. Please refer to Postal Service's response to questions 1.a. and 1.c. above. If these revenues and costs should not be included under the IRA-USPS agreement, please explain to which inbound international product in the Mail Classification Schedule (MCS) the revenue included in cell C24 and the associated costs should be attributed. In your explanation, please provide the MCS section number.

RESPONSE:

- a. Please see Non-public Response, filed under seal.²
- b. Please see Non-public Response, filed under seal.³
- c. Please see Non-public Response, filed under seal.⁴

¹ Notice of United States Postal Service of Filing Additional Signatory and Other Related Information to Inbound Competitive Multi-Service IRA-USPS Agreement, June 29, 2020 (June 29 Notice).

² The Postal Service incorporates by reference the Application for Non-public Treatment of Materials that it filed in this case. See Notice of United States Postal Service of Filing Functionally Equivalent Inbound Competitive Multi-Service Agreement with Foreign Postal Operators, Docket No. CP2020-141, May 15, 2020 (May 15 Notice), at Attachment 1 (Application of United Postal Service for Non-Public Treatment of Materials).

³ The Postal Regulatory Commission (PRC) filed Question no. 1, part b, of this ChIR No. 2 under seal. The Postal Service therefore also files this question and its response under seal. The Postal Service further incorporates by reference the Application for Non-public Treatment of Materials that it filed in this case. See May 15 Notice, at Attachment 1 (Application of United Postal Service for Non-Public Treatment of Materials).

⁴ The Postal Service incorporates by reference the Application for Non-public Treatment of Materials that it filed in this case. See May 15 Notice, at Attachment 1 (Application of United Postal Service for Non-Public Treatment of Materials).

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- d. Not applicable.

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2. Please refer to the Notice, Attachment 2, and to the Standard Packets file.
 - a. Please explain the specific type of product to which the surcharge in Annex 2, Section 3.2, paragraph (3) will apply.
 - b. Please specify where in the Standard Packets file the Postal Service included the volume that this specific type of product represents, by country, as well as the costs and revenues incurred from its delivery.
 - c. Please confirm that the Postal Service is able to identify this specific type of product for operational and accounting purposes.

RESPONSE:

- a. Please see Non-public Response, filed under seal.⁵
- b. Please see Non-public Response, filed under seal.⁶
- c. Confirmed.

⁵ *Id.*

⁶ *Id.*

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3. Please refer to Excel file "NONPUBLIC USPS-CP2020-141-SPP_WP.xlsx" (Premium Parcels file), tab "06_Totals," rows 49, 65, 70, 84, 96, 112, and 113. Please confirm that the countries in the referenced rows will be parties to the IRA-USPS Agreement in Calendar Year 2021. If confirmed, please explain why the Postal Service did not include revenues and costs for premium parcel volumes from the referenced countries and file revised workpapers, as appropriate.

RESPONSE:

Please see Non-public Response, filed under seal.⁷

⁷ *Id.*